

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

TOMAS LORENZO PEREZ,  
Petitioner,

vs

UNITED STATES OF AMERICA,  
Respondent.

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DC Case No. 3:97-cr-190

AC Case No. 99-1237

REQUEST FOR PRODUCTION OF STATEMENTS, RECORD AND  
MOTION FOR DISCLOSURE OF GRAND JURY MATERIAL  
FOR GOVERNMENT'S FAILURE TO OPPOSED BY  
09/15/07 AS ORDERED BY THIS COURT

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U.S. DISTRICT COURT  
SAN JUAN, PR

COMES NOW, the Petitioner, Tomas Lorenzo Perez, pro-se, and respectfully request this Honorable Court to issue and Order to the Government to produce the statements, record and grand jury material pursuant to Title 18 U.S.C. §3500, for the Government's failure to prosecute as Ordered by this Court on July 17, 2007. petitioner offers the following in support thereof:


1. Petitioner is pro se and request that this Honorable Court treats this motion very liberal.
2. Petitioner offers his original motion for Production of Statements, Records and Motion for Disclosure of Grand Jury Material as Exhibit "A".
3. Petitioner offers this Honorable Court's Order dated July 17, 2007 ordering the Government to give their Opposition by August 15, 2007 as Exhibit "B".
4. As of this Motion, October 15, 2007, the Government has not opposed the production of requested material.

5. Petitioner asserts that the production of said material and statements from the grand jury would in fact demonstrate that testimony that was given to indict the petitioner was in-fact tainted and false.

6. Petitioner avers that the Government's failure to give their opposition to his original Motion for the production of grand jury material is the same as lack of prosecution and he should be granted his request for the production of same.

WHEREFORE, based on the above, petitioner prays that This Honorable Court issue an order directing the United States to produce the requested statements, record, and grand jury material as originally requested in his motion, herein as Exhibit "A".

Respectfully submitted,

  
Tomas Lorenzo Perez, Petitioner  
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